

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PEARSON EDUCATION, INC.;
BEDFORD, FREEMAN & WORTH
PUBLISHING GROUP, LLC D/B/A
MACMILLAN LEARNING;
MACMILLAN HOLDINGS, LLC;
CENGAGE LEARNING, INC.;
ELSEVIER INC.; ELSEVIER B.V.;
MCGRAW HILL LLC; AMERICAN
ACADEMY OF PEDIATRICS;
AMERICAN HEART ASSOCIATION,
INC.; AMERICAN PSYCHIATRIC
ASSOCIATION; AMERICAN
PSYCHOLOGICAL ASSOCIATION,
INC.; GUILFORD PUBLICATIONS,
INC.; HARPERCOLLINS PUBLISHERS
LLC; THE ZONDERVAN
CORPORATION LLC; JOHN WILEY
AND SONS, INC.; JONES & BARTLETT
LEARNING, LLC; NO STARCH PRESS,
INC.; PENGUIN RANDOM HOUSE LLC;
PENGUIN BOOKS LIMITED
COMPANY; SOURCEBOOKS, LLC;
SIMON & SCHUSTER, INC.; SPRINGER
PUBLISHING COMPANY, LLC;
TAYLOR & FRANCIS GROUP LLC;
W.W. NORTON & COMPANY, INC.;
LIVERIGHT PUBLISHING
CORPORATION; and
WOLTERS KLUWER HEALTH, INC.;

Plaintiffs,

v.

KHALED HASAN; NASIMA AKHTER;
ANK EXIM LLC; AURUM AMB LLC;
IIZ FORWARDING LLC; WESTPVT LTD
LLC; PRITAM SINGH; POOJA BISHT;
ANKUSH SHARMA; ANSHOO
SHARMA, PRAVEEN KUMAR
SHARMA; ANINDITA MAHANTA;
MOHD KASHIF RASHID; SAMAN

Civil Action No. 23-cv-07284-PAC

**[PROPOSED] AMENDED
PRELIMINARY INJUNCTION AND
EXPEDITED DISCOVERY ORDER**

NAAZ; ZYRUS ERETAIL PRIVATE LIMITED; TWIQ EXPORT PVT LTD; STOREMATE KART SERVICES PVT LTD; LIFE OF RILEY PRIVATE LIMITED; LIFE OF RILEY INTERNATIONAL INC.; POOJA SHARMA; and DOES 1–50,

Defendants.

Plaintiffs Pearson Education, Inc. (“Pearson”), Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning (“Macmillan Learning”), Cengage Learning, Inc. (“Cengage”), Elsevier Inc. (“Elsevier”), McGraw Hill LLC (“McGraw Hill”), American Academy of Pediatrics (“AAP”), American Heart Association, Inc. (“AHA”), American Psychiatric Association (“American Psychiatric”), American Psychological Association, Inc. (“American Psychological”), Guilford Publications, Inc. (“Guilford Press”), HarperCollins Publishers LLC (“HarperCollins”), The Zondervan Corporation LLC (“Zondervan”), John Wiley and Sons, Inc. (“Wiley”), Jones & Bartlett Learning, LLC (“Jones & Bartlett Learning”), No Starch Press, Inc. (“No Starch”), Penguin Random House LLC (“PRH”), Sourcebooks, LLC (“Sourcebooks”), Simon & Schuster, Inc. (“Simon & Schuster”), Springer Publishing Company, LLC (“Springer Publishing”), Taylor & Francis Group LLC (“Taylor & Francis”), W.W. Norton & Company, Inc. (“W.W. Norton”), Liveright Publishing Corporation (“Liveright”), and Wolters Kluwer Health, Inc. (“Wolters Kluwer”) (collectively, the “Publishers”), and Macmillan Holdings, LLC (“Macmillan Holdings”), Elsevier B.V., and Penguin Books Limited Company (“Penguin Books”) (collectively, with Publishers, “Plaintiffs”), have moved for entry of an Amended Preliminary Injunction and Expedited Discovery Order against Defendants Khaled Hasan, Nasima Akhter, ANK EXIM LLC, AURUM AMB LLC, IIZ FORWARDING LLC, WESTPVT LTD LLC, Pritam Singh, Pooja Bisht, Ankush Sharma, Anshoo Sharma, Praveen Kumar Sharma, Anindita Mahanta,

Mohd Kashif Rashid, Saman Naaz, Zyrus eRetail Private Limited, TWIQ EXPORT PVT LTD, STOREMATE KART SERVICES PVT LTD, Life of Riley Private Limited, Life of Riley International Inc., Pooja Sharma, and Does 1–50, who are also identified by the currently known seller names, names, aliases, and email addresses described in **Appendix C** hereto (collectively, “Defendants”). Plaintiffs so move the Court on the basis that Defendants are reproducing and/or distributing unauthorized, counterfeit copies of the Publishers’ copyrighted books that bear identical or substantially indistinguishable reproductions of the registered trademarks of Plaintiffs Cengage, Elsevier, Elsevier B.V., Macmillan Holdings, McGraw Hill, Pearson, AAP, AHA, American Psychiatric, American Psychological, Guilford Press, HarperCollins, Zondervan, Wiley, Jones & Bartlett Learning, No Starch, PRH, Penguin Books, Sourcebooks, Simon & Schuster, Springer Publishing, Taylor & Francis, W.W. Norton, and Wolters Kluwer (collectively, “Trademark Plaintiffs”). Plaintiffs allege that these distributions occur, without limitation, through importations, sales on online storefronts Defendants own and/or operate (“Online Storefronts”) on online marketplaces, including Amazon.com, Abebooks.com, and eBay.com (“Online Marketplaces”), and sales on “buyback portals” operated by several national textbook distributors (“National Distributors”).

The Court having reviewed the Complaint, the Amended Complaint, the Memorandum of Law in Support of Plaintiffs’ Motion to Amend Preliminary Injunction and Expedited Discovery Order (“Motion”), the Declaration of Michele H. Murphy filed in support of the Motion, and the entire record herein, and having granted Plaintiffs’ original request for a Preliminary Injunction on September 14, 2023 (ECF No. 34), makes the following findings of fact and conclusions of law:

FACTUAL FINDINGS AND CONCLUSIONS OF LAW

1. On October 23, 2023, the Court granted the Original Plaintiffs’ Motion to Amend the Complaint, permitting the filing of the Amended Complaint (ECF No. 66), which adds New

Plaintiffs¹ and New Defendants² to this case. Plaintiffs have provided Defendants with notice of the Motion and all supporting papers.

2. The Court has already found that it has personal jurisdiction over the Original Defendants based on the Original Plaintiffs' claims. Prelim. Inj. at 2–3. For the same reasons, the Court also has personal jurisdiction over all Defendants, including the New Defendants, with respect to all Plaintiffs' claims in the Amended Complaint. Such jurisdiction exists under Section 302(a) of the New York Civil Practice Law and Rules ("C.P.L.R.") on the grounds that Defendants: (i) own and/or operate highly interactive Online Storefronts on highly interactive websites that are continuously accessible to and sell and deliver goods to consumers in New York, including copies of the Publishers' books that are listed in Exhibit A to the Amended Complaint, which is attached hereto as **Appendix A** (the "Authentic Works"); (ii) have sold copies of the Publishers' books to New York consumers, including copies of the Authentic Works; (iii) have engaged in the importation of books into the Port of New York and New Jersey and/or by air into New York, including copies of certain Authentic Works; (iv) have distributed counterfeit books for sale, including copies of certain Authentic Works, from a warehouse in Astoria, New York, and/or transported and stored such counterfeit books to and in the same warehouse for further distribution;

¹ The "New Plaintiffs" added in the Amended Complaint are AAP, AHA, American Psychiatric, American Psychological, Guilford Press, HarperCollins, Zondervan, Wiley, Jones & Bartlett Learning, No Starch, PRH, Sourcebooks, Simon & Schuster, Springer Publishing, Taylor & Francis, W.W. Norton, Liveright, and Wolters Kluwer (collectively, "New Publishers"), and Penguin Books. The "Original Plaintiffs" are Pearson, Macmillan Learning, Cengage, Elsevier, and McGraw Hill (collectively, "Original Publishers"), and Macmillan Holdings and Elsevier B.V.

² The "New Defendants" added in the Amended Complaint are Pritam Singh, Pooja Bisht, Ankush Sharma, Anshoo Sharma, Praveen Kumar Sharma, Anindita Mahanta, Mohd Kashif Rashid, Saman Naaz, Zyrus eRetail Private Limited, TWIQ EXPORT PVT LTD, STOREMATE KART SERVICES PVT LTD, Life of Riley Private Limited, Life of Riley International Inc., and Pooja Sharma, along with those Doe Defendants identified by fictitious names that Plaintiffs discovered after the filing of the original Complaint. The "Original Defendants" are Khaled Hasan, Nasima Akhter, ANK EXIM LLC, AURUM AMB LLC, IIZ FORWARDING LLC, and WESTPVT LTD (three other defendants originally named have been voluntarily dismissed without prejudice), along with those Doe Defendants identified by fictitious names that were known to the Original Plaintiffs at the time of the filing of the original Complaint.

and/or (iv) have committed tortious acts in New York by the above-described conduct or caused injury to Plaintiffs in New York.

3. The Court has already found that, as a result of the Original Defendants' distribution of counterfeit copies of the Original Publishers' Authentic Works in the United States, bearing unauthorized copies the Original Trademark Plaintiffs'³ trademarks, the Original Plaintiffs are likely to succeed on the merits of their copyright infringement claims under the Copyright Act and their trademark infringement claims (specifically, trademark counterfeiting) under the Lanham Act. Prelim. Inj. at 3. For the same reasons: (i) all Publishers, including the New Publishers, are likely to succeed in showing that all Defendants, including the New Defendants, have infringed and are continuing to infringe the federally registered copyrights in the Authentic Works the Publishers own or exclusively control, including through reproductions, importations, sales on Online Storefronts on Online Marketplaces, and/or sales to National Distributors; and (ii) all Trademark Plaintiffs, including the New Trademark Plaintiffs, are likely to succeed in showing that all Defendants, including the New Defendants, have infringed and are continuing to infringe the federally registered trademarks of which the Trademark Plaintiffs are the owners and/or registrants, as defined in 15 U.S.C. § 1127, including by using counterfeit reproductions of trademarks, as defined in 15 U.S.C. § 1127, in commerce in connection with the sale, offering for sale, and/or distribution of counterfeit books.

4. The Court has already found that the continued sale and distribution of counterfeit copies of the Original Publishers' books, which bear infringing reproductions of the Original

³ The "Original Trademark Plaintiffs" are Cengage, Elsevier, Elsevier B.V., Macmillan Holdings, McGraw Hill, and Pearson. The "New Trademark Plaintiffs" added in the Amended Complaint are AAP, AHA, American Psychiatric, American Psychological, Guilford Press, HarperCollins, Zondervan, Wiley, Jones & Bartlett Learning, No Starch, PRH, Penguin Books, Sourcebooks, Simon & Schuster, Springer Publishing, Taylor & Francis, W.W. Norton, and Wolters Kluwer.

Trademark Plaintiffs' trademarks, will result in immediate and irreparable injury to the Original Plaintiffs if preliminary injunctive relief is not granted. Prelim. Inj. at 3. For the same reasons, the continued sale and distribution of counterfeit copies of the New Publishers' books, which bear infringing reproductions of the New Trademark Plaintiffs' trademarks, will result in immediate and irreparable injury to the New Plaintiffs if the relief requested in the Motion is not granted.

5. The Court has already found that the balance of potential harm to the Original Defendants, if any, by being prevented from continuing to profit from infringing activities is far outweighed by the harm to the Original Plaintiffs, their businesses, and the value associated with their copyrights and trademarks if preliminary injunctive relief is not issued. Prelim. Inj. at 4. For the same reasons, such balancing of the hardships favors all Plaintiffs, including the New Plaintiffs, against all Defendants, including the New Defendants.

6. The Court has already found that the public interest favors issuance of preliminary injunctive relief as to the Original Plaintiffs and Original Defendants. Prelim. Inj. at 4. For the same reasons, the public interest favors issuing this Amended Preliminary Injunction. Doing so is consistent with protecting Plaintiffs' interests in their intellectual property rights, including the New Plaintiffs', and protecting the public from the harm caused by Defendants' infringement, including the New Defendants', including the potential that consumers will be confused and deceived into believing, incorrectly, that they are purchasing authentic copies of the Publisher's books.

7. The Court has already found that an asset restraint against the Original Defendants in favor of the New Plaintiffs is appropriate. Prelim. Inj. at 8. For the same reasons, and based on the evidence presented concerning the nature and extent of Defendants' counterfeiting activities, including the New Defendants', as well as their efforts to conceal their identities and counterfeit

book sales, and the actions of other counterfeiters in the comparable position of Defendants, without the asset restraint provisions set forth below, Defendants, including the New Defendants, are likely to secrete, conceal, transfer, or otherwise dispose of the proceeds from their sales of the counterfeit books, thus frustrating Plaintiffs' ability to obtain the final relief they seek.

AMENDED PRELIMINARY INJUNCTION

NOW, THEREFORE, IT IS HEREBY ORDERED, in accordance with Federal Rules of Civil Procedure 64 and 65, the Copyright Act (17 U.S.C. § 502(a)), the Lanham Act (15 U.S.C. § 1116), N.Y. C.P.L.R. §§ 6201 *et al.*, and the Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, that:

1. Defendants, their officers, agents, employees, and attorneys, and all those in active concert or participation with any of them, who receive actual notice of this Amended Preliminary Injunction, are enjoined from:

- a. Directly or indirectly infringing any copyrighted work that is owned or exclusively controlled by any of the Publishers ("Publishers' Copyrighted Works"), i.e., any copyrighted works published under any of the imprints identified in Exhibit C to the Amended Complaint, which is attached hereto as **Appendix B** (the "Imprints"); and
- b. Directly or indirectly infringing any trademark to which any of the Trademark Plaintiffs are the owners and/or registrants under 15 U.S.C. § 1127 ("Trademark Plaintiffs' Marks").

Without limiting the foregoing, this injunction includes:

- c. Directly or indirectly manufacturing copies of or otherwise reproducing the Publishers' Copyrighted Works or the Trademark Plaintiffs' Marks;

- d. Directly or indirectly exporting, importing, distributing, selling, offering for sale, advertising, marketing, or promoting counterfeit or pirated copies of the Publishers' Copyrighted Works or the Trademark Plaintiffs' Marks; and
- e. Enabling, facilitating, permitting, assisting, soliciting, encouraging, or inducing others to engage in the activities described in paragraphs 1(a)–(d) above;

2. Defendants, their officers, agents, employees, and attorneys, and all those in active concert or participation with any of them, who receive actual notice of this Amended Preliminary Injunction, and service providers to Defendants or other non-parties who receive actual notice of this Amended Preliminary Injunction and operate or control accounts holding or receiving money or other assets owned by, related to, connected to, associated with, held by, or transferred in connection with Defendants' Online Storefronts, sales or attempted sales to the National Distributors, or distributions (including importations) of the Publishers' Copyrighted Works ("Defendants' Accounts"), must immediately locate all of Defendants' Accounts and immediately cease transferring, withdrawing, or otherwise disposing of any money or other assets in Defendants' Accounts or allowing such money or other assets in Defendants' Accounts to be transferred, withdrawn, or otherwise disposed of. Defendants' Accounts include, but are not limited to Defendants' Accounts with Online Marketplaces and National Distributors; payment processing services, such as PayPal, Inc. ("Payment Processors"); and banks, savings and loan associations, credit card processing agencies, merchant acquiring banks, cryptocurrency exchanges, and other companies that engage in the processing or transfer of money and/or other assets ("Financial Institutions"), including but not limited to those accounts listed on **Appendix D** hereto.

IT IS FURTHER ORDERED that Defendants shall preserve copies of all documents, including electronically stored information, in their possession, custody, or control relating to any importations, distributions, or sales of Publishers' Copyrighted Works, and all copies of the Publishers' Copyrighted Works and products displaying the Trademark Plaintiffs' Trademarks, and shall take all steps necessary to retrieve any such information or products that may have been deleted or disposed of before the entry of this Order.

IT IS FURTHER ORDERED that the Order Authorizing Alternate Service by Electronic Mail contained in the August 17, 2023 *Ex Parte* Order (ECF No. 14) and August 28, 2023 Modified *Ex Parte* Order (ECF No. 26) shall remain in effect.

IT IS FURTHER ORDERED that this Amended Preliminary Injunction shall no longer apply to any Defendant dismissed from this action.

IT IS FURTHER ORDERED that this Amended Preliminary Injunction replaces and supersedes the Preliminary Injunction issued on September 14, 2023 (ECF No. 34).

EXPEDITED DISCOVERY ORDER

Sufficient cause having been shown, **IT IS HEREBY ORDERED** that:

1. Within two (2) days of receiving actual notice of the Amended Preliminary Injunction, Defendants and any individual or entity providing services to Defendants in connection with activities referred to in the Amended Complaint (including but not limited to Online Marketplaces, National Distributors, Payment Processors, Financial Institutions, and Extra Space Storage, as referenced in the August 28, 2023 Modified *Ex Parte* Order) shall provide to Plaintiffs' counsel, via email to publisher.lawsuit@oandzlaw.com, written disclosure of the following information:

- a. All names, physical addresses, email addresses, Internet Protocol (“IP”) addresses, and account numbers or similar identifiers (“Identification Information”) associated with the Defendants or their accounts with the person or entity providing discovery;
- b. Identification Information for any other online storefronts, buyback portal accounts, or other accounts associated with or related to the accounts identified pursuant to paragraph 1(a) immediately above; and
- c. Identification Information for the Defendants’ Accounts, together with the current balance of each such account.

2. Plaintiffs may immediately issue expedited discovery requests to the Defendants and/or seek via subpoena from relevant non-parties who shall provide within no more than seven (7) days of service of the requests or subpoenas, information regarding the following:

- a. Defendants’ inventory of the Publishers’ Copyrighted Works, including the relevant title, International Standard Book Number, and the location of such inventory;
- b. Defendants’ sales of the Publishers’ Copyrighted Works from August 17, 2020 to the present;
- c. Defendants’ activity related to the importing or exporting of the Publishers’ Copyrighted Works from August 17, 2020 to the present; and
- d. Account statements for the Defendants from August 17, 2020 to the present.

3. Plaintiffs may immediately issue expedited discovery requests and/or subpoenas seeking the inspection of the Publishers’ Copyrighted Works held in inventory by a Defendant or by a non-party on behalf of or in association with a Defendant. Plaintiffs and Defendants and, if

applicable, any non-parties, shall work cooperatively to coordinate the inspection of the

Publishers' Copyrighted Works within five (5) business days of Plaintiffs' request.

SO ORDERED this the 9th day of November 2023 at 4:15 am (p.m.)



Paul A. Crotty
UNITED STATES DISTRICT JUDGE

APPENDIX A - AUTHENTIC WORKS

Title	Publisher	Copyright Registration Number
Bright Futures: Guidelines for Health Supervision of Infants, Children, and Adolescents, 4th Edition	American Academy of Pediatrics	TX0008664184
Textbook of Neonatal Resuscitation 8th ed	American Academy of Pediatrics	TX0009042943
Advanced Cardiovascular Life Support Provider Manual	American Heart Association, Inc.	TX0008908126
Basic Life Support Provider Manual	American Heart Association, Inc.	TX0008908152
Desk Reference to the Diagnostic Criteria from DSM-5	American Psychiatric Association	TX0007830969
Desk Reference to the Diagnostic Criteria from DSM-5-TR	American Psychiatric Association	TX0009137633
Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition	American Psychiatric Association	TXu001847542
Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition, Text Revision (DSM-5-TR)	American Psychiatric Association	TX0009108279
The Pocket Guide to the DSM-5 Diagnostic Exam	American Psychiatric Association	TX0007828490
The Pocket Guide to the DSM-5-TR Diagnostic Exam	American Psychiatric Association	TX0009145777
Publication Manual, 7th	American Psychological Association, Inc.	TX0008796505
Criminal Justice in Action: The Core, 9th	Cengage Learning, Inc.	TX0008377398
Eliciting Sounds: Techniques and Strategies for Clinicians, 2nd	Cengage Learning, Inc.	TX0006568417
Fundamentals of Case Management Practice, 5th	Cengage Learning, Inc.	TX0008010680
Learning and Behavior, 7th	Cengage Learning, Inc.	TX0007690271
Mathematics for Plumbers and Pipefitters, 8th	Cengage Learning, Inc.	TX0007629574
Principles of Macroeconomics, 9th	Cengage Learning, Inc.	TX0008935097
Principles of Microeconomics, 9th	Cengage Learning, Inc.	TX0008988436
Spreadsheet Modeling & Decision Analysis: A Practical Introduction to Business Analytics, 8th	Cengage Learning, Inc.	TX0008432608
The Essentials of Statistics: A Tool for Social Research, 4th	Cengage Learning, Inc.	TX0008048909
The Principles of Learning and Behavior, 7th	Cengage Learning, Inc.	TX0007819802
Theory-Based Treatment Planning for Marriage and Family Therapists	Cengage Learning, Inc.	TX0005663929
Advanced Health Assessment & Clinical Diagnosis in Primary Care, 6th	Elsevier Inc.	TX0007511204
Advanced Health Assessment and Clinical Diagnosis in Primary Care, 7th	Elsevier Inc.	TX0007511204
Anatomy Trains, 4th	Elsevier Inc.	TX0009034772
Mosby's Exam Review for Computed Tomography, 3rd	Elsevier Inc.	TX0008565510
Mosby's Pocket Guide to Fetal Monitoring A Multidisciplinary Approach, 9th	Elsevier Inc.	TX0009128872
Physical Examination and Health Assessment, 8th	Elsevier Inc.	TX0008149272
Pocket Companion for Physical Examination and Health Assessment, 8th	Elsevier Inc.	TX0008133847
Policy and Politics in Nursing and Health Care, 8th	Elsevier Inc.	TX0007760963
Rapid Review Pathology, 5th	Elsevier Inc.	TX0007732939
Sheehy's Manual of Emergency Care, 7th	Elsevier Inc.	TX0007578503
Sheehy's Manual of Emergency Care, 8th	Elsevier Inc.	TX0007578503

APPENDIX A - AUTHENTIC WORKS

Title	Publisher	Copyright Registration Number
Teaching in Nursing, 6th	Elsevier Inc.	TX0008838277
Varcariolis' Foundations of Psychiatric-Mental Health Nursing, 9th	Elsevier Inc.	TX0007797007
Clinician's Thesaurus, 8th Edition: The Guide to Conducting Interviews and Writing Psychological Reports	Guilford Publications, Inc.	TX0008771172
Cognitive Behavior Therapy, Third Edition: Basics and Beyond	Guilford Publications, Inc.	TX0008908026
DBT Skills Manual for Adolescents	Guilford Publications, Inc.	TX0008078396
DBT Skills Training Manual, Second Edition	Guilford Publications, Inc.	TX0007987639
Internal Family Systems Therapy, Second Edition	Guilford Publications, Inc.	TX0008818959
Mind Over Mood, Second Edition: Change How You Feel by Changing the Way You Think	Guilford Publications, Inc.	TX0008194179
Motivational Interviewing in Health Care: Helping Patients Change Behavior	Guilford Publications, Inc.	TX0006960987
Motivational Interviewing, Third Edition: Helping People Change	Guilford Publications, Inc.	TX0007650111
Dave Grohl The Storyteller: Tales of Life and Music	HarperCollins Publishers LLC	TX0009150169
The Subtle Art of Not Giving a F*ck	HarperCollins Publishers LLC	TX0008329523
Architectural Detailing[: Function, Constructibility, Aesthetics], 3rd Edition	John Wiley and Sons, Inc.	TX0008251620
AWS Certified Solutions Architect Study Guide: Associate SAA-CO2 Exam, 3rd Edition	John Wiley and Sons, Inc.	TX0008750551
Building Codes Illustrated: A Guide to Understanding the 2021 International Building Code, 7th Edition	John Wiley and Sons, Inc.	TX0008201560
Building Construction Illustrated, 6th Edition	John Wiley and Sons, Inc.	TX0007882692
Clinical Interviewing 6th Edition	John Wiley and Sons, Inc.	TX0008363774
Counseling and Psychotherapy Theories in Context and Practice, 3rd Edition	John Wiley and Sons, Inc.	TX0007506562
Counseling the Culturally Diverse[: Theory and Practice], 7th Edition	John Wiley and Sons, Inc.	TX0008208413
Counseling the Culturally Diverse[: Theory and Practice], 8th Edition	John Wiley and Sons, Inc.	TX0008208413
Counseling the Culturally Diverse[: Theory and Practice], 9th Edition	John Wiley and Sons, Inc.	TX0008208413
Health Care Information Systems[: A Practical Approach for Health Care Management], 4th Edition	John Wiley and Sons, Inc.	TX0007762450
Health Care Information Systems[: A Practical Approach for Health Care Management], 5th Edition	John Wiley and Sons, Inc.	TX0007762450
Materials Science and Engineering: An Introduction, 9th Edition	John Wiley and Sons, Inc.	TX0007824600
Organic Chemistry As a Second Language: Second Semester Topics, 5th Edition	John Wiley and Sons, Inc.	TX0008220650
Organic Chemistry as a Second Language[: First Semester Topics], 5th Edition	John Wiley and Sons, Inc.	TX0008292799

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Title	Publisher	Copyright Registration Number
Reframing Organizations[: Artistry, Choice, and Leadership], 7th Edition	John Wiley and Sons, Inc.	TX0008439041
Storytelling with Data: A Data Visualization Guide for Business Professionals	John Wiley and Sons, Inc.	TX0008188021
The Addiction Progress Notes Planner, 6th Edition	John Wiley and Sons, Inc.	TX0007993863
The Architect's Studio Companion: Rules of Thumb for Preliminary Design, 6th Edition	John Wiley and Sons, Inc.	TX0008546701 TX0008378891
The Business of Venture Capital[: The Art of Raising a Fund, Structuring Investments, Portfolio Management, and Exits], 3rd Edition	John Wiley and Sons, Inc.	TX0007952884
The Complete Adult Psychotherapy Treatment Planner, 6th Edition	John Wiley and Sons, Inc.	TX0007849583
Venture Deals: Be Smarter Than Your Lawyer and Venture Capitalist, 4th Edition	John Wiley and Sons, Inc.	TX0008960768
Brannigan's Building Construction for the Fire Service, 6th	Jones & Bartlett Learning, LLC	TX0008865905
Curriculum Development in Nursing Education, 4th	Jones & Bartlett Learning, LLC	TX0008736044
Delivering Health Care in America, 8th	Jones & Bartlett Learning, LLC	TX0009310647
Emergency Care and Transportation of the Sick and Injured Student Workbook, 12th	Jones & Bartlett Learning, LLC	TX0009220778
Essentials of the U.S. Health Care System, 6th	Jones & Bartlett Learning, LLC	TX0009251732
Financial Management for Nurse Managers, 5th	Jones & Bartlett Learning, LLC	TX0009226342
Forensic Nursing, 2nd A Handbook for Practice	Jones & Bartlett Learning, LLC	TX0007458917
Gynecologic Health Care: With an Introduction to Prenatal and Postpartum Care, 4th	Jones & Bartlett Learning, LLC	TX0008966825
Milstead's Health Policy and Politics, 7th	Jones & Bartlett Learning, LLC	TX0009130252
Novick & Morrow's Public Health Administration: Principles for Population-Based Management, 4th	Jones & Bartlett Learning, LLC	TX0009310638
Nurse as Educator: Principles of Teaching and Learning for Nursing Practice, 6th	Jones & Bartlett Learning, LLC	TX0009176679
Nurse Practitioner's Business Practice and Legal Guide, 7th	Jones & Bartlett Learning, LLC	TX0009097888
Nursing Informatics and the Foundation of Knowledge, 5th	Jones & Bartlett Learning, LLC	TX0009307106
Philosophies and Theories for Advanced Nursing Practice, 4th	Jones & Bartlett Learning, LLC	TX0009130258
Policy and Politics for Nurses and Other Health Professionals: Advocacy and Action, 3rd	Jones & Bartlett Learning, LLC	TX0008736487
Role Development for the Nurse Practitioner, 3rd	Jones & Bartlett Learning, LLC	TX0009145479
Statistics for Nursing: A Practical Approach, 3rd	Jones & Bartlett Learning, LLC	TX0008745349
Sultz & Young's Health Care USA: Understanding Its Organization and Delivery, 9th	Jones & Bartlett Learning, LLC	TX0008411378
The Doctor of Nursing Practice Project: A Framework for Success, 3rd	Jones & Bartlett Learning, LLC	TX0008746646

APPENDIX A - AUTHENTIC WORKS

Title	Publisher	Copyright Registration Number
The Doctor of Nursing Practice: A Guidebook for Role Development and Professional Issues, 5th	Jones & Bartlett Learning, LLC	TX0009115783
Theory and Research for Academic Nurse Educators: Application to Practice: Application to Practice, 1st	Jones & Bartlett Learning, LLC	TX0007277750
Jesus and John Wayne: How White Evangelicals Corrupted a Faith and Fractured a Nation	Liveright Publishing Corporation	TX0009028846
Developing Person Through the Life Span, 11th	Macmillan Learning	TX0009002996
Psychology, 13th	Macmillan Learning	TX0009054292
Biomedical Ethics, 7th	McGraw Hill LLC	TX0006238860
Construction Planning, Equipment, and Methods, 9th	McGraw Hill LLC	TX0008561238
Intimate Relationships, 8th	McGraw Hill LLC	TX0008730045
Managerial Economics (The McGraw-Hill Economics Series), 12th	McGraw Hill LLC	TX0008803609
Option Volatility & Pricing, 2nd	McGraw Hill LLC	TX0007996421
Shigley's Mechanical Engineering Design, 10th	McGraw Hill LLC	TX0007920259
The Handbook of Loan Syndications and Trading, 2nd	McGraw Hill LLC	TX0006436903
Eloquent JavaScript, 3rd Edition: A Modern Introduction to Programming	No Starch Press, Inc.	TX0009310210
Open Circuits: The Inner Beauty of Electronic Components	No Starch Press, Inc.	TX0009312575
Python Crash Course, 3rd Edition: A Hands-On, Project Based Introduction to Programming	No Starch Press, Inc.	TX0009311057
50 Strategies for Teaching English Language Learners, 6th	Pearson Education, Inc.	TX0008770508
A Framework for Marketing Management, 6th	Pearson Education, Inc.	TX0008123806
Anatomy and Physiology Coloring Workbook: A Complete Study Guide, 12th	Pearson Education, Inc.	TX0008476224
Chemical Process Equipment Design, 1st	Pearson Education, Inc.	TX0008520629
Chemistry the Central Science, 14th	Pearson Education, Inc.	TX0008458230
Construction Planning and Scheduling, 4th	Pearson Education, Inc.	TX0007488334
Contemporary Logistics, 12th	Pearson Education, Inc.	TX0007884074
Domain-Driven Design: Tackling Complexity in the Heart of Software	Pearson Education, Inc.	TX0005856342
Ethical, Legal, and Professional Issues in Counseling (The Merrill Counseling), 6th	Pearson Education, Inc.	TX0008790635
Family Therapy, 10th	Pearson Education, Inc.	TX0007573188
Family Therapy: Concepts and Methods, 11th	Pearson Education, Inc.	TX0008242375
Handbook of Informatics for Nurses and Healthcare Professionals, 6th	Pearson Education, Inc.	TX0008732121
How English Works: A Linguistic Introduction, 3rd	Pearson Education, Inc.	TX0007334043
John E. Freund's Mathematical Statistics with Applications, 8th	Pearson Education, Inc.	TX0007658363
Lecture-Tutorials: For Introductory Astronomy, 3/E	Pearson Education, Inc.	TX0007651919
Lecture-Tutorials: For Introductory Astronomy, 4th	Pearson Education, Inc.	TX0007651919
Market-Based Management, 6th	Pearson Education, Inc.	TX0007513422

APPENDIX A - AUTHENTIC WORKS

Title	Publisher	Copyright Registration Number
Marketing Management, 15th (Misc. A 1 offs)	Pearson Education, Inc.	TX0008144794
Mastering the National Counselor Examination and the Counsel Preparation Comprehensive Examination, 3rd	Pearson Education, Inc.	TX0007893801
Patternmaking for Fashion Design, 5th	Pearson Education, Inc.	TX0007164368
Social Psychology, 9th	Pearson Education, Inc.	TX0008126280
Statistical Methods for the Social Sciences, 5th	Pearson Education, Inc.	TX0008538328
Structural Analysis, 10th	Pearson Education, Inc.	TX0008734403
Supply Chain Management, 7th	Pearson Education, Inc.	TX0008571575
The Essentials of Family Therapy, 6th	Pearson Education, Inc.	TX0007691293
The Essentials of Family Therapy, 7th	Pearson Education, Inc.	TX0008787731
The Pragmatic Programmer: Your Journey to Mastery, 20th Anniversary Edition, 2E	Pearson Education, Inc.	TX0005086790
Understanding Financial Statements, 11th	Pearson Education, Inc.	TX0008023145
Between Two Kingdoms A Memoir of a Life Interrupted	Penguin Random House LLC	TX0009165754
FAIR PLAY: A Game-Changing Solution for When You Have Too Much to Do (and More Life to Live)	Penguin Random House LLC	TX0008825906
PAIN FREE A Revolutionary Method for Stopping Chronic Pain, Revised and Updated Second Edition	Penguin Random House LLC	TX0009146931
Psilocybin Mushrooms of the World: an identificatoin guide	Penguin Random House LLC	TX0004470978
The Anthropocene Reviewed: Essays on a Human-Centered Planet	Penguin Random House LLC	TX0009224850
The Ethical Slut, The Practical Guide to Polyamory, Open Relationships and Other Freedoms in Sex and Love, 3rd Edition	Penguin Random House LLC	TX0008547077
Come as You Are	Simon & Schuster, Inc.	TX0008017942
It Ends with Us	Simon & Schuster, Inc.	TX0008345814
Maybe Not	Simon & Schuster, Inc.	TX0008961241
Maybe Now	Simon & Schuster, Inc.	TX0008962066
Maybe Someday	Simon & Schuster, Inc.	TX0007875282
November 9	Simon & Schuster, Inc.	TX0008961237
Hooked	Sourcebooks, LLC	TX0009252478
Evaluation and Testing in Nursing Education, 5e	Springer Publishing Company, LLC	TX0008344278
Evaluation and Testing in Nursing Education, 6th	Springer Publishing Company, LLC	TX0008855627
Functional and Behavioral Assessment, Diagnosis, and Treatment, 3rd	Springer Publishing Company, LLC	TX0008452965
Jonas and Kovner's Health Care Delivery in the United States, 12th	Springer Publishing Company, LLC	TX0008706654
Jonas and Kovner's Health Care Delivery in the United States, 13th	Springer Publishing Company, LLC	TX0009266382
PMHNP-BC Certification Practice Q&A	Springer Publishing Company, LLC	TX0009158545
Population-Based Nursing: Concepts and Competencies for Advanced Practice, 3rd	Springer Publishing Company, LLC	TX0008792661

APPENDIX A - AUTHENTIC WORKS

Title	Publisher	Copyright Registration Number
Project Management for the Advanced Practice Nurse, 2nd	Springer Publishing Company, LLC	TXu002178396
Social Work Licensing Clinical Exam Guide, 3rd Edition	Springer Publishing Company, LLC	TX0008927482
Transformational Leadership in Nursing, 3rd	Springer Publishing Company, LLC	TX0008913491
Behavior Modification: What It Is and How to Do it, 11th Edition	Taylor & Francis Group LLC	TX0007929925
Case Studies on Diversity and Social Justice Education, Second Edition	Taylor & Francis Group LLC	TX0008573426
Effective Police Supervision, 9e	Taylor & Francis Group LLC	TX0007882307
Encyclopedia of Counseling, 4th	Taylor & Francis Group LLC	TX0006929019
Ethics for Behavior Analysts, 4e	Taylor & Francis Group LLC	TX0008290064
Practical Guide to Clinical Data Management, Third Edition	Taylor & Francis Group LLC	TX0007473585
School-Community Relations, 5e	Taylor & Francis Group LLC	TX0007681449
Single Case Research Methodology, 3rd	Taylor & Francis Group LLC	TX0008576934
Teaching Community: a pedagogy of hope	Taylor & Francis Group LLC	TX0005836485
Teaching to Transgress: Education as the Practice of Freedom	Taylor & Francis Group LLC	TX0003937761
The Practice of Emotionally Focused Couple Therapy, 3e	Taylor & Francis Group LLC	TX0006069143
Doing Life with Your Adult Children	The Zondervan Corporation LLC	TX0008736483
The Case for Christ	The Zondervan Corporation LLC	TX0008327593
A New Approach to Sight Singing, 6th	W.W. Norton & Company, Inc.	TX0007367492
Essential Cell Biology, 5th	W.W. Norton & Company, Inc.	TX0007996856
The Immune System, 5th	W.W. Norton & Company, Inc.	TX0007286624
They Say / I Say: The Moves That Matter in Academic Writing Fourth Edition	W.W. Norton & Company, Inc.	TX0008791854
They Say / I Say: The Moves That Matter in Academic Writing, 5th	W.W. Norton & Company, Inc.	TX0008791854
They Say / I Say: The Moves That Matter in Academic Writing, with Readings, 5th	W.W. Norton & Company, Inc.	TX0008791865
We The People: An Introduction to American Politics, 13th	W.W. Norton & Company, Inc.	TX0009027190
We The People: An Introduction to American Politics, 14th	W.W. Norton & Company, Inc.	TX0009027190
A Practical Guide to Botulinum Toxin Procedures, 1e	Wolters Kluwer Health, Inc.	TX0007749946
ACSM's Guidelines for Exercise Testing and Prescription, 11th	Wolters Kluwer Health, Inc.	TX0008411922
Bates' Guide to Physical Examination and History Taking, 13th	Wolters Kluwer Health, Inc.	TX0009295633
Bates' Pocket Guide to Physical Examination and History Taking, 9e	Wolters Kluwer Health, Inc.	TX0008939376
Certified Nurse Educator Review Book: The Official NLN Guide to the CNE Exam, 2e	Wolters Kluwer Health, Inc.	TX0008890096

APPENDIX A - AUTHENTIC WORKS

Title	Publisher	Copyright Registration Number
Essentials of Nursing Research: Appraising Evidence for Nursing Practice, 10e	Wolters Kluwer Health, Inc.	TX0009205569
Evidence-Based Practice in Nursing & Healthcare, 5e	Wolters Kluwer Health, Inc.	TX0009280691
Evidence-Based Practice in Nursing & Healthcare: A Guide to Best Practice, 4e	Wolters Kluwer Health, Inc.	TX0008738166
Kaplan & Sadock's Synopsis of Psychiatry, 12th	Wolters Kluwer Health, Inc.	TX0007957089
Leadership Roles and Management Functions in Nursing: Theory and Application, 11e	Wolters Kluwer Health, Inc.	TX0009297545
Pharmacotherapeutics for Advanced Practice: A Practical Approach, 5e	Wolters Kluwer Health, Inc.	TX0008433151
SOAP for Family Medicine, 2e	Wolters Kluwer Health, Inc.	TX0008785554
Surgical Recall, 9th	Wolters Kluwer Health, Inc.	TX0008557596
The Only EKG Book You'll Ever Need, 10e	Wolters Kluwer Health, Inc.	TX0009207824
The Psychiatric Interview, 4e	Wolters Kluwer Health, Inc.	TX0008328111
The Wills Eye Manual: Office and Emergency Room Diagnosis and Treatment of Eye Disease, 8e	Wolters Kluwer Health, Inc.	TX0008996812

APPENDIX B - IMPRINTS

Plaintiff	Imprint
American Psychiatric Association	American Psychiatric Association
American Psychiatric Association	American Psychiatric Association Publishing
American Psychiatric Association	American Psychiatric Press, Inc
American Psychiatric Association	American Psychiatric Publishing
American Psychological Association, Inc.	APA Books
American Psychological Association, Inc.	APA Journals
American Psychological Association, Inc.	APA LifeTools
American Psychological Association, Inc.	APA Publication Manual
American Psychological Association, Inc.	APA Reference
American Psychological Association, Inc.	APA Style
American Psychological Association, Inc.	APA Videos
American Psychological Association, Inc.	Educational Publishing Foundation
American Psychological Association, Inc.	Magination Press
Cengage Learning, Inc.	Brooks Cole
Cengage Learning, Inc.	Cengage
Cengage Learning, Inc.	Cengage Learning
Cengage Learning, Inc.	Course Technology
Cengage Learning, Inc.	Delmar
Cengage Learning, Inc.	Gale
Cengage Learning, Inc.	Heinle
Cengage Learning, Inc.	Milady
Cengage Learning, Inc.	National Geographic Learning
Cengage Learning, Inc.	South-Western Educational Publishing
Cengage Learning, Inc.	Wadsworth
Elsevier Inc.	Academic Cell
Elsevier Inc.	Academic Press
Elsevier Inc.	Amirsys
Elsevier Inc.	Butterworth Heinemann
Elsevier Inc.	Digital Press
Elsevier Inc.	Elsevier
Elsevier Inc.	Gulf Professional Publishing
Elsevier Inc.	Hanley & Belfus
Elsevier Inc.	Knovel
Elsevier Inc.	Made Simple Books
Elsevier Inc.	Medicine Publishing
Elsevier Inc.	Morgan Kaufmann Publishers
Elsevier Inc.	Mosby
Elsevier Inc.	Newnes
Elsevier Inc.	North Holland
Elsevier Inc.	Saunders
Elsevier Inc.	Urban & Fischer
Elsevier Inc.	William Andrew
Elsevier Inc.	Woodhead Publishing
Guilford Publications, Inc.	The Guilford Press

APPENDIX B - IMPRINTS

Plaintiff	Imprint
HarperCollins Publishers LLC	Allida
HarperCollins Publishers LLC	Amistad
HarperCollins Publishers LLC	Amistad For Young Readers
HarperCollins Publishers LLC	Applesauce Press
HarperCollins Publishers LLC	Avon
HarperCollins Publishers LLC	Balzer + Bray
HarperCollins Publishers LLC	Blink
HarperCollins Publishers LLC	Broadside
HarperCollins Publishers LLC	Caedmon
HarperCollins Publishers LLC	Canary Street Press
HarperCollins Publishers LLC	Carina Press
HarperCollins Publishers LLC	Cider Mill Press
HarperCollins Publishers LLC	Clarion
HarperCollins Publishers LLC	Collins
HarperCollins Publishers LLC	Dey Street
HarperCollins Publishers LLC	Ecco
HarperCollins Publishers LLC	Editorial CLIE
HarperCollins Publishers LLC	Emanate Books
HarperCollins Publishers LLC	Graydon House
HarperCollins Publishers LLC	Greenwillow Books
HarperCollins Publishers LLC	Grupo Nelson
HarperCollins Publishers LLC	Hanover Square Press
HarperCollins Publishers LLC	Harlequin Desire
HarperCollins Publishers LLC	Harlequin Heartwarming
HarperCollins Publishers LLC	Harlequin Historical
HarperCollins Publishers LLC	Harlequin Intrigue
HarperCollins Publishers LLC	Harlequin Medical Romance
HarperCollins Publishers LLC	Harlequin Presents
HarperCollins Publishers LLC	Harlequin Romance
HarperCollins Publishers LLC	Harlequin Romantic Suspense
HarperCollins Publishers LLC	Harlequin Special Edition
HarperCollins Publishers LLC	Harlequin Special Releases
HarperCollins Publishers LLC	Harlequin Teen
HarperCollins Publishers LLC	Harper
HarperCollins Publishers LLC	Harper Alley
HarperCollins Publishers LLC	Harper Audio
HarperCollins Publishers LLC	Harper Avenue
HarperCollins Publishers LLC	Harper Business
HarperCollins Publishers LLC	Harper Celebrate
HarperCollins Publishers LLC	Harper Christian Resources
HarperCollins Publishers LLC	Harper Festival
HarperCollins Publishers LLC	Harper Horizon
HarperCollins Publishers LLC	Harper Muse
HarperCollins Publishers LLC	Harper Perennial

APPENDIX B - IMPRINTS

Plaintiff	Imprint
HarperCollins Publishers LLC	Harper Select
HarperCollins Publishers LLC	Harper Trophy Canada
HarperCollins Publishers LLC	Harper Voyager
HarperCollins Publishers LLC	Harper Wave
HarperCollins Publishers LLC	HarperCollins Español
HarperCollins Publishers LLC	HarperCollins Leadership
HarperCollins Publishers LLC	HarperCollins Publishers
HarperCollins Publishers LLC	HarperOne
HarperCollins Publishers LLC	HarperTeen
HarperCollins Publishers LLC	HarperVia
HarperCollins Publishers LLC	Harvest
HarperCollins Publishers LLC	Heartdrum
HarperCollins Publishers LLC	HQN Books
HarperCollins Publishers LLC	Inkyard Press
HarperCollins Publishers LLC	Katherine Tegen Books
HarperCollins Publishers LLC	Love Inspired
HarperCollins Publishers LLC	Love Inspired Special Releases
HarperCollins Publishers LLC	Love Inspired Suspense
HarperCollins Publishers LLC	Magnolia Publications
HarperCollins Publishers LLC	Mariner Books
HarperCollins Publishers LLC	Martin Luther King Jr. Library
HarperCollins Publishers LLC	MIRA Books
HarperCollins Publishers LLC	Nelson Books
HarperCollins Publishers LLC	Park Row Books
HarperCollins Publishers LLC	Patrick Crean Editions
HarperCollins Publishers LLC	Quill Tree Books
HarperCollins Publishers LLC	Silhouette Books
HarperCollins Publishers LLC	Thomas Nelson
HarperCollins Publishers LLC	Tommy Nelson
HarperCollins Publishers LLC	Versify
HarperCollins Publishers LLC	Vida
HarperCollins Publishers LLC	W Publishing Group
HarperCollins Publishers LLC	Walden Pond Press
HarperCollins Publishers LLC	Westbow Press
HarperCollins Publishers LLC	William Morrow
HarperCollins Publishers LLC	Zonderkidz
HarperCollins Publishers LLC	Zondervan
HarperCollins Publishers LLC	Zondervan Academic
HarperCollins Publishers LLC	Zondervan Books
HarperCollins Publishers LLC	Zondervan Reflective
John Wiley and Sons, Inc.	ATYPON
John Wiley and Sons, Inc.	Dummies
John Wiley and Sons, Inc.	Five Behaviors of a Cohesive Team
John Wiley and Sons, Inc.	For Dummies

APPENDIX B - IMPRINTS

Plaintiff	Imprint
John Wiley and Sons, Inc.	HINDAWI
John Wiley and Sons, Inc.	JK Lasser
John Wiley and Sons, Inc.	Jossey-Bass
John Wiley and Sons, Inc.	SYBEX
John Wiley and Sons, Inc.	TECH TODAY
John Wiley and Sons, Inc.	The Leadership Challenge
John Wiley and Sons, Inc.	Wiley-IEEE Press
John Wiley and Sons, Inc.	WROX
John Wiley and Sons, Inc.	WROX & Design
John Wiley and Sons, Inc.	WROX PROGRAMMER TO PROGRAMMER
John Wiley and Sons, Inc.	ZYANTE
John Wiley and Sons, Inc.	ZYBOOKS
Macmillan Learning	Bedford, Freeman & Worth High School Publishers
Macmillan Learning	Bedford/St. Martin's
Macmillan Learning	BFW
Macmillan Learning	BFW High School Publishers
Macmillan Learning	Freeman
Macmillan Learning	Macmillan Learning
Macmillan Learning	W.H. Freeman & Company
Macmillan Learning	Worth
Macmillan Learning	Worth Publishers
McGraw Hill LLC	Irwin
McGraw Hill LLC	Lange
McGraw Hill LLC	McGraw Hill
McGraw Hill LLC	McGraw-Hill
McGraw Hill LLC	McGraw-Hill Education
McGraw Hill LLC	McGraw-Hill Higher Education
McGraw Hill LLC	McGraw-Hill Professional
McGraw Hill LLC	McGraw-Hill Ryerson
McGraw Hill LLC	McGraw-Hill/Appleton & Lange
McGraw Hill LLC	McGraw-Hill/Contemporary
McGraw Hill LLC	McGraw-Hill/Dushkin
McGraw Hill LLC	McGraw-Hill/Irwin
McGraw Hill LLC	NTC/Contemporary
McGraw Hill LLC	Osborne
McGraw Hill LLC	Schaum's
Pearson Education, Inc.	Addison Wesley
Pearson Education, Inc.	Adobe Press
Pearson Education, Inc.	Allyn & Bacon
Pearson Education, Inc.	Benjamin Cummings
Pearson Education, Inc.	Big Nerd Ranch Guides
Pearson Education, Inc.	Brady
Pearson Education, Inc.	Cisco Press
Pearson Education, Inc.	Edexcel

APPENDIX B - IMPRINTS

Plaintiff	Imprint
Pearson Education, Inc.	Financial Times Press/FT Press
Pearson Education, Inc.	IBM Press
Pearson Education, Inc.	Longman
Pearson Education, Inc.	Microsoft Press
Pearson Education, Inc.	New Riders Press
Pearson Education, Inc.	Peachpit Press
Pearson Education, Inc.	Pearson
Pearson Education, Inc.	Pearson Education
Pearson Education, Inc.	Que Publishing
Pearson Education, Inc.	Sams Publishing
Pearson Education, Inc.	VMware Press
Penguin Random House LLC	Alfred A. Knopf
Penguin Random House LLC	Alfred A. Knopf Books for Young Readers
Penguin Random House LLC	Alibi
Penguin Random House LLC	Alpha
Penguin Random House LLC	Amphoto Books
Penguin Random House LLC	Anchor Books
Penguin Random House LLC	Appetite by Random House
Penguin Random House LLC	Avery
Penguin Random House LLC	Ballantine
Penguin Random House LLC	Bantam
Penguin Random House LLC	Berkley
Penguin Random House LLC	Broadway Books
Penguin Random House LLC	Clarkson Potter
Penguin Random House LLC	Convergent Books
Penguin Random House LLC	Crown Archetype
Penguin Random House LLC	Crown Books for Young Readers
Penguin Random House LLC	Crown Business
Penguin Random House LLC	Crown Forum
Penguin Random House LLC	Crown Trade
Penguin Random House LLC	Currency
Penguin Random House LLC	Del Rey
Penguin Random House LLC	Delacorte Press
Penguin Random House LLC	Dell
Penguin Random House LLC	Dial Books for Young Readers
Penguin Random House LLC	Dial Press
Penguin Random House LLC	DK
Penguin Random House LLC	Doubleday
Penguin Random House LLC	Dragonfly Books
Penguin Random House LLC	Dutton
Penguin Random House LLC	Everyman's Library
Penguin Random House LLC	Flamingo Books
Penguin Random House LLC	Frederick Warne
Penguin Random House LLC	Golden Books

APPENDIX B - IMPRINTS

Plaintiff	Imprint
Penguin Random House LLC	Grosset and Dunlap
Penguin Random House LLC	Harmony Books
Penguin Random House LLC	Hogarth
Penguin Random House LLC	Image Catholic Books
Penguin Random House LLC	Inklit
Penguin Random House LLC	Intermix
Penguin Random House LLC	Jove
Penguin Random House LLC	Kokila
Penguin Random House LLC	Laurel Leaf Books
Penguin Random House LLC	Loveswept
Penguin Random House LLC	Modern Library
Penguin Random House LLC	Nan A. Talese
Penguin Random House LLC	Nancy Paulson Books
Penguin Random House LLC	New American Library
Penguin Random House LLC	Now I'm Reading!
Penguin Random House LLC	One World
Penguin Random House LLC	Pam Krauss Books
Penguin Random House LLC	Pamela Dorman
Penguin Random House LLC	Pantheon Books
Penguin Random House LLC	Penguin Books
Penguin Random House LLC	Penguin Classics
Penguin Random House LLC	Penguin Life
Penguin Random House LLC	Penguin Press
Penguin Random House LLC	Penguin Young Readers
Penguin Random House LLC	Philomel
Penguin Random House LLC	Plume
Penguin Random House LLC	Portfolio
Penguin Random House LLC	Potter Craft
Penguin Random House LLC	Potter Style
Penguin Random House LLC	Prentice Hall Press
Penguin Random House LLC	Price Stern Sloan
Penguin Random House LLC	Puffin
Penguin Random House LLC	Putnam
Penguin Random House LLC	Putnam's Books for Young Readers
Penguin Random House LLC	Random House
Penguin Random House LLC	Random House Books for Young Readers
Penguin Random House LLC	Random House Large Print
Penguin Random House LLC	Random House Puzzles and Games
Penguin Random House LLC	Random House Reference
Penguin Random House LLC	Razorbill
Penguin Random House LLC	Rise x Penguin Workshop
Penguin Random House LLC	Riverhead
Penguin Random House LLC	ROC
Penguin Random House LLC	Rodale

APPENDIX B - IMPRINTS

Plaintiff	Imprint
Penguin Random House LLC	Sasquatch Books
Penguin Random House LLC	Schocken Books
Penguin Random House LLC	Schwartz & Wade
Penguin Random House LLC	Sentinel
Penguin Random House LLC	Signal
Penguin Random House LLC	Signet
Penguin Random House LLC	Signet Eclipse
Penguin Random House LLC	Signet Select
Penguin Random House LLC	Spectra
Penguin Random House LLC	Sylvan Learning
Penguin Random House LLC	Tarcher Pedigree
Penguin Random House LLC	Ten Speed Press
Penguin Random House LLC	Three Rivers Press
Penguin Random House LLC	Tiny Reparations
Penguin Random House LLC	Underlined
Penguin Random House LLC	Viking
Penguin Random House LLC	Viking Children's
Penguin Random House LLC	Viking Studio
Penguin Random House LLC	Vintage Books
Penguin Random House LLC	Vintage Espanol
Penguin Random House LLC	WaterBrook Multnomah
Penguin Random House LLC	Watson-Guptill
Penguin Random House LLC	Wendy Lamb
Penguin Random House LLC	Yearling Books
Penguin Random House LLC	Zeitgeist
Simon & Schuster, Inc.	Adams Media
Simon & Schuster, Inc.	Aladdin
Simon & Schuster, Inc.	Atheneum
Simon & Schuster, Inc.	Atria
Simon & Schuster, Inc.	Avid Reader Press
Simon & Schuster, Inc.	Beach Lane Books
Simon & Schuster, Inc.	Denene Millner Books
Simon & Schuster, Inc.	Emily Bestler Books
Simon & Schuster, Inc.	Folger Shakespeare Library
Simon & Schuster, Inc.	Free Press
Simon & Schuster, Inc.	Gallery
Simon & Schuster, Inc.	Howard
Simon & Schuster, Inc.	Jeter Publishing
Simon & Schuster, Inc.	Little Simon
Simon & Schuster, Inc.	Margaret K. McElderry
Simon & Schuster, Inc.	One Signal
Simon & Schuster, Inc.	Paul Wiseman Books
Simon & Schuster, Inc.	Saga Press
Simon & Schuster, Inc.	Salaam Reads

APPENDIX B - IMPRINTS

Plaintiff	Imprint
Simon & Schuster, Inc.	Scout Press
Simon & Schuster, Inc.	Scribner
Simon & Schuster, Inc.	Simon & Schuster
Simon & Schuster, Inc.	Simon & Schuster Books for Young Readers
Simon & Schuster, Inc.	Simon Element
Simon & Schuster, Inc.	Simon Spotlight
Simon & Schuster, Inc.	Threshold
Simon & Schuster, Inc.	Touchstone
Sourcebooks, LLC	Bloom books
Sourcebooks, LLC	Cumberland House
Sourcebooks, LLC	Dawn Publications Connection Children With Nature
Sourcebooks, LLC	duopress
Sourcebooks, LLC	Little Pickle Press
Sourcebooks, LLC	Poisoned Pen Press
Sourcebooks, LLC	put me in the story
Sourcebooks, LLC	sourcebooks
Sourcebooks, LLC	sourcebooks casablanca
Sourcebooks, LLC	sourcebooks explore
Sourcebooks, LLC	sourcebooks fire
Sourcebooks, LLC	sourcebooks jabberwocky
Sourcebooks, LLC	sourcebooks kids
Sourcebooks, LLC	sourcebooks landmark
Sourcebooks, LLC	sourcebooks wonderland
Sourcebooks, LLC	sourcebooks young readers
Sourcebooks, LLC	St
Springer Publishing Company, LLC	Demos Health
Springer Publishing Company, LLC	Demos Medical
Springer Publishing Company, LLC	Springer Publishing Company
Taylor & Francis Group LLC	CRC Press
Taylor & Francis Group LLC	Routledge
Taylor & Francis Group LLC	Taylor & Francis
W.W. Norton & Company, Inc.	Countryman Press
W.W. Norton & Company, Inc.	Liveright
W.W. Norton & Company, Inc.	Norton
W.W. Norton & Company, Inc.	Norton Professional Books
W.W. Norton & Company, Inc.	Norton Young Readers
Wolters Kluwer Health, Inc.	Lippincott Williams & Wilkins
Wolters Kluwer Health, Inc.	LWW
Wolters Kluwer Health, Inc.	Nurse Think
Wolters Kluwer Health, Inc.	ThePoint
Wolters Kluwer Health, Inc.	Wolters Kluwer
Wolters Kluwer Health, Inc.	Wolters Kluwer Health Lippincott Williams & Wilkins

APPENDIX C - CONTACT INFORMATION

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AARAV EXPORT LLC	phouse10@yahoo.com
AAREXT LLC	phouse10@yahoo.com
AB02- Malika Store	gulmalikae@gmail.com
abbooks.shop	shoptshirtne@gmail.com
ABBY ENDRES	bhaveshexportllc@gmail.com
ABBY ENDRES	delawaredistributors@gmail.com
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Abhit Sharma	radhey741@outlook.com
Abhit Sharma	ramsingh859@outlook.com
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Abhit Sharma	sunilkumarthakur9099@gmail.com
Abhit Sharma	tomcruise814@yahoo.com
Adambooks	balbirbisht.1@gmail.com
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Alex Davidson	maxonlinemarkets@gmail.com
Alfred Homes	peopleshat@gmail.com
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ALLIE SHUB	delawaredistributors@gmail.com
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APPENDIX C - CONTACT INFORMATION

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APPENDIX C - CONTACT INFORMATION

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Veronica Espinosa	pnirwan07@gmail.com
Veronica Hernandez Guerrero	aurumamb@gmail.com
Vidhu Menon	vidhum55@yahoo.com
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vinabook.shop	tuanh190396@gmail.com

APPENDIX C - CONTACT INFORMATION

Defendant, Alias, or Other Name Used	Email Address
Vishal Saxena	vishaldbe96@gmail.com
Warehouse KSF	inospirestore@gmail.com
Wembley Books	
WESTPVT LTD LLC	hasan.k6497@gmail.com
WESTPVT LTD LLC	westpvtltd@gmail.com
WILLIAN FEATHER	paternbergtech@gmail.com
WONDERS NEW	reportingupdates1@gmail.com
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Zyrus Eretail Private Limited	peopleshat@gmail.com
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	taflanagan33@gmail.com

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
Abebooks	0675
AbeBooks	5239
Abebooks	1542
Abebooks	0903
Abebooks	8442
Abebooks	1309
Abebooks	8502
Abebooks	7261
Abebooks	0335
Abebooks	2567
Amazon	6790
Amazon	7602
Amazon	6102
Amazon	0505
Amazon	2405
Amazon	1915
Amazon	2002
Amazon	0302
Amazon	6022
Amazon	0402
Amazon	8202
Amazon	7002
Amazon	6102
Amazon	9002
Amazon	3302
Amazon	8702
Amazon	1702
Amazon	6302
Amazon	8802
Amazon	2402
Amazon	5402
Amazon	7902
Amazon	8002
Amazon	3902
Amazon	3402
Amazon	8902
Amazon	5402
Amazon	5902
Amazon	5502

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
Amazon	8802
Amazon	8202
Amazon	8202
Amazon	5302
Amazon	5402
Amazon	7002
Amazon	9102
Amazon	1702
Amazon	2302
Amazon	2202
Amazon	6102
Amazon	7802
Amazon	MO6L
Amazon	OGE6
Amazon	E84S
Amazon	09Q4
Amazon	8YVB
Amazon	QG5X
Amazon	UL1S
Amazon	NSTY
Amazon	Z0A2
Amazon	UBK0
Amazon	7E88
Amazon	RTW1
Amazon	BSEX
Amazon	MBOV
Amazon	MRMF
Amazon	X69G
Amazon	H9Q3
Amazon	ZB25
Amazon	4WXO
Amazon	YCVG
Amazon	9H92
Amazon	ZM0M
Amazon	UKJ5
Amazon	2P4S
Amazon	Y1PJ
Amazon	OG4L
Amazon	F2D6

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
Amazon	I9KZ
Amazon	NGSJ
Amazon	JATT
Asia Commercial Bank	4257
AU SMALL FINANCE BANK LIMITED	6560
AU SMALL FINANCE BANK LIMITED	9610
Axis Bank	2353
Axis Bank	9258
Axis Bank	8861
Bank of America NA	5039
Bank of America NA	5194
Bank of America NA	5288
Bank of America NA	5409
Bank of America NA	5612
Bank of America NA	5612
Bank of America NA	2820
Bank of America NA	4099
Bank of America NA	0000
Bank of America NA	9322
Bank of America NA	5559
Bank of America NA	8843
Bank of America NA	7193
Bank of America NA	5558
Bank of America NA	5557
Bank of America NA	9311
BANK OF THE WEST	5261
BMO Bank N.A.	5261
Canadian Imperial Bank of Commerce	2291
Canadian Imperial Bank of Commerce	4267
China Citic Bank	1501
Citibank (Payoneer Inc.)	1812
Citibank Canada	3775
Citibank Canada	0804
Citibank for international wire transfer	5973
Citibank NA	5452
Citibank NA	2958
Citibank NA	1945
Citibank NA	6689
Citibank NA	0864

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
Citibank NA	9132
Citibank NA	0440
Citibank NA	8200
Citibank NA	8219
Citibank NA	9748
Citibank NA	7252
Citibank NA	6689
Citibank NA	2476
Citibank NA	1615
Citibank NA	8220
Citibank NA	9131
Citibank NA	9133
Citibank NA	0324
Citibank NA	8149
Citibank NA	6911
Citibank NA	9344
Citibank NA	4885
Citibank NA	6146
Citibank NA	0003
Citibank NA	0004
Commerzbank AG	1400
Commerzbank AG	8100
Commerzbank AG	1400
Community Federal Savings Bank	9162
Community Federal Savings Bank	7372
Community Federal Savings Bank	2589
Community Federal Savings Bank	2590
Community Federal Savings Bank	2594
Community Federal Savings Bank	2120
Community Federal Savings Bank	9946
Community Federal Savings Bank	9947
Community Federal Savings Bank	9949
Community Federal Savings Bank	9950
Community Federal Savings Bank	115
DIRECTCASH BANK	8497
DIRECTCASH BANK	7191
DIRECTCASH BANK	1473
eBay	2762
eBay	5243

APPENDIX D - DEFENDANTS' ACCOUNTS

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
Evolve Bank & Trust	4262
Federal Bank	7027
Federal Bank	7878
FIFTH THIRD BANK NATIONAL ASSOCIATION	1831
First Century Bank NA	4113
First Century Bank NA	2361
First Century Bank NA	2526
First Century Bank NA	6527
First Century Bank NA	8189
First Century Bank NA	2638
First Century Bank NA	0989
First Century Bank NA	0148
First Century Bank NA	2362
First Century Bank NA	2387
First Century Bank NA	5504
First Century Bank NA	5272
First Century Bank NA	2030
First Century Bank NA	5556
First Century Bank NA	2533
First Century Bank NA	6129
First Century Bank NA	2716
First Century Bank NA	2029
First Century Bank NA	2991
First Century Bank NA	0473
First Century Bank NA	1265
First Century Bank NA	2385
First Century Bank NA	9214
First Century Bank NA	9523
First Century Bank NA	8191
First Century Bank NA	2814
First Century Bank NA	2990
First Century Bank NA	2384
First Century Bank NA	8190
First Century Bank NA	2027
First Century Bank NA	9049
First Century Bank NA	4076
First Century Bank NA	9719
First Century Bank NA	5564
First Century Bank NA	9875
First Century Bank NA	2383
First Century Bank NA	5117

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
First Century Bank NA	6557
First Century Bank NA	2125
Foris Dax	603
Fulton Bank, NA	8652
HDFC Bank	7965
HDFC Bank	0371
HDFC Bank	0816
HDFC Bank	1831
HDFC Bank	6453
HDFC Bank	2091
HDFC Bank	9384
HDFC Bank	7818
HDFC Bank	3296
HDFC Bank	8554
HDFC Bank	0129
HDFC Bank	0409
HDFC Bank	3583
HDFC Bank	3596
HDFC Bank	8335
HDFC Bank	8020
HDFC Bank	2318
HDFC Bank	7730
HDFC Bank	7907
HDFC Bank	4035
HDFC Bank	0418
HDFC Bank	1830
ICICI Bank Ltd	9276
ICICI Bank Ltd	9276
ICICI Bank Ltd	4880
ICICI Bank Ltd	1123
ICICI Bank Ltd	1630
ICICI Bank Ltd	3274
ICICI Bank Ltd	3924
ICICI Bank Ltd	0636
ICICI Bank Ltd	0636
ICICI Bank Ltd	1152
ICICI Bank Ltd	2808
ICICI Bank Ltd	4005
ICICI Bank Ltd	4013
ICICI Bank Ltd	4015
ICICI Bank Ltd	5652
ICICI Bank Ltd	9447
IDBI Bank	5908
IDFC Bank Ltd	0091
IDFC Bank Ltd	7654

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
IndusInd Bank	7973
IndusInd Bank Ltd	4774
IndusInd Bank Ltd	3820
IndusInd Bank Ltd	3159
IndusInd Bank Ltd	7777
ING BANK NV, SPANISH BRANCH (DIRECT)	3345
JPMorgan Chase Bank, NA	9166
JPMorgan Chase Bank, NA	8207
JPMorgan Chase Bank, NA	1993
JPMorgan Chase Bank, NA	2709
JPMorgan Chase Bank, NA	2709
JPMorgan Chase Bank, NA	8318
JPMorgan Chase Bank, NA	9289
JPMorgan Chase Bank, NA	8118
KBC BANK NV	3919
Kotak Mahindra Bank	5446
Pathward, N.A.	9281
Pathward, N.A.	7184
Payoneer	9380
Payoneer	1821
Payoneer	5284
Payoneer	9894
Payoneer	9043
Payoneer	0607
Payoneer	8422
Payoneer	5089
Payoneer	6573
Payoneer	4036
Payoneer	2192
Payoneer	8025
Payoneer	6711
Payoneer	0188
Payoneer	3395
Payoneer	5247
Payoneer	4269
Payoneer	5226
Payoneer	5684
Payoneer	2278
Payoneer	8919
Payoneer	2668
Payoneer	8314
Payoneer	3146
Payoneer	6834
Payoneer	4417
Payoneer	8538

APPENDIX D - DEFENDANTS' ACCOUNTS

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
Payoneer	0515
Payoneer	1939
Payoneer	4551
Payoneer	2452
Payoneer	8973
Payoneer	6306
Payoneer	9378
Payoneer	0977
Payoneer	0188
Payoneer	1613
Payoneer	3142
Payoneer	5043
Payoneer	2958
Payoneer	1945
Payoneer	1400
Payoneer	9276
Payoneer	9162
Payoneer	2589
Payoneer	2590
Payoneer	2594
Payoneer	9946
Payoneer	9947
Payoneer	9949
Payoneer	9950
Payoneer	5446
Payoneer	7886
Payoneer	0302
Payoneer	3924
Payoneer	1152
Payoneer	2808
Payoneer	4013
Payoneer	4015
Payoneer	4774
Payoneer	3820
Payoneer	7973
Payoneer	0371
Payoneer	0731
Payoneer	2361
Payoneer	2526
Payoneer	8189

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
Payoneer	2638
Payoneer	2387
Payoneer	6129
Payoneer	2716
Payoneer	2991
Payoneer	1265
Payoneer	2385
Payoneer	8191
Payoneer	2990
Payoneer	2384
Payoneer	8190
Payoneer	4076
Payoneer	9719
Payoneer	9875
Payoneer	2383
Payoneer	8118
Payoneer	0273
Payoneer	1831
Payoneer	7818
Payoneer	3296
Payoneer	4035
Payoneer	0418
Payoneer	0388
Payoneer	5908
Payoneer	2353
Payoneer	1376
Payoneer	3009
Payoneer	5900
Payoneer	8200
Payoneer	4973
Payoneer	1501
Payoneer	6032
Payoneer	8328
Payoneer Europe Limited	0199
PayPal	1564
PayPal	1305
PayPal	6560
PayPal	8806
PayPal	8748
PayPal	2973

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
PayPal	5493
PayPal	6537
PayPal	4828
PayPal	5172
Paypal	9755
PayPal	0698
PayPal	9136
PayPal	5529
PayPal	2460
PayPal	0733
PayPal	2520
PayPal	9064
PayPal	5229
PayPal	5345
PayPal	4555
PayPal	4390
PayPal	2837
PayPal	3460
PayPal	3106
PayPal	4570
PayPal	3582
PayPal	6247
PayPal	5400
PayPal	6359
PayPal	4609
PayPal	0522
PayPal	8245
PayPal	9144
Paypal	3083
PayPal	2715
PNC BANK NA	4172
Punjab National Bank	3009
RBL Bank	0731
RBL BANK LIMITED	2600
Royal Bank Of Canada	9380
Royal Bank of Canada	1821
Santander UK	2545
State Bank of India	7886
STATE BANK OF INDIA (SBI)	2719
STRIDE BANK, NA	4999
SUTTON BANK	8372
TapTap Send	9814
TapTap Send	3156
TD BANK, NA	1846
TD BANK, NA	6840

Online Marketplace, Payment Processor, or Financial Institution	Redacted Account or ACH Number
TD BANK, NA	3313
The Toronto Dominion Bank	5284
The Toronto Dominion Bank	9894
UTIB0000884	8174
Vietcombank	0302
Wells Fargo Bank, NA	7891
Wells Fargo Bank, NA	3197
Wells Fargo Bank, NA	9725
Wells Fargo Bank, NA	4495
Wells Fargo Bank, NA	4973
World First UK Ltd	3295
World First UK Ltd	3295
YESB0000737	5652
YESB0000737	0388